
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:)	Case No.: 18-31574
Marilyn E Charles)	
)	Chapter 13
)	
Debtor(s).)	Judge: Timothy A. Barnes

NOTICE OF MOTION

TO: Marilyn E Charles, 3125 W Jarlath St. Chicago, IL 60645 *via US mail*
Trustee Marilyn Marshall, 224 S. Michigan Ave., #800, Chicago, IL 60604 *via ECF clerk's electronic delivery system*
U.S. Trustee, 219 S. Dearborn Suite 873, Chicago, IL 60604 *via ECF clerk's electronic delivery system*
OneMain, PO Box 3251 Evansville, IN 47731-3251 *via US mail*
OneMain Financial, 601 NW 2nd St Evansville, IN 47708 *via US mail*
See attached service list

PLEASE TAKE NOTICE that on **May 23, 2019 at 9:30 a.m.**, I shall appear before the Honorable Timothy Barnes, at the Dirksen Federal Court, 219 S. Dearborn, Courtroom 744, Chicago, Illinois 60604, or any judge presiding and then and there present this **Motion**, a copy of which is attached hereto.

By: /s/ David H. Cutler
David H. Cutler

CERTIFICATE OF SERVICE

I, David H. Cutler, hereby certify that I caused to be served, electronically or through U.S. Mail, a copy of the foregoing Notice and Motion upon the parties named above on May 2, 2019 before the hour of 8:00 p.m. from the office located at 4131 Main Street., Skokie, Illinois 60076.

By: /s/ David H. Cutler
David H. Cutler, esq.
Counsel for Debtor(s):
Cutler & Associates, Ltd.
4131 Main St,
Skokie, IL 60076
Phone: (847) 673-8600

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MOTION TO MODIFY PLAN POST CONFIRMATION

NOW COMES the Debtor, Marilyn E Charles by and through his attorneys, the law office of CUTLER & ASSOCIATES, and in support of this Motion, states as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 USC 1334 and this is a "core proceeding" under 28 USC 157(b)(2).
2. The Debtor filed for relief under Chapter 13 of the United States Bankruptcy Code on November 9, 2018.
3. The Debtors plan was confirmed on January 10, 2019.
4. The Debtor's plan was confirmed with a payment of \$185 for 53 months with unsecured creditors receiving 10% of their unsecured claims.
5. The Debtor's confirmed Chapter 13 plan, in section 3.5 surrender of collateral lists that the debtor will surrender a 2002 Buick Grand Marquix to the creditor OneMain Financial.
6. The Debtor's confirmed Chapter 13 plan, in section 3.5 has the wrong make of the vehicle, it is not a Buick it is a Mercury and the model is spelled wrong, it should be Marquis. The correct listing should be a 2002 Mercury Grand Marquis, the collateral description was filed incorrectly.

7. The Debtor seeks to modify his plan post confirmation to list in section 3.5 surrender of collateral the correct description of the collateral, he seeks to list it correctly as a 2002 Mercury Grand Marquis.
8. The Debtor seeks to modify his plan post confirmation to correctly list the collateral that he is surrendering to OneMain Financial as a 2002 Mercury Grand Marquis.

WHEREFORE, the Debtor respectfully requests that this Court modify the Debtor's plan post confirmation to list under section 3.5 of the plan that the collateral being surrendered to OneMain Financial is a 2002 Mercury Grand Marquis and for such further relief that this Court may deem just and proper.

Dated: May 2, 2019

Respectfully Submitted,

By: /s/ David H. Cutler
David H. Cutler, esq.,
Counsel for Debtor(s):
Cutler & Associates, Ltd.
4131 Main St.
Skokie, IL 60076
Phone: (847) 673-8600